

## **REMARKS**

Claims 39 through 50 and 61 through 74 are pending in the application. Claims 41, 42, 50, and 61 through 74 have been allowed. Claim 44 was objected to but indicated as allowable if rewritten in independent form. Claim 44 is amended herein to be placed in independent form and is thus also allowable.

The remaining claims of record stand rejected under § 103(a) in view of the GB '320 reference to Sykes, as set forth in paragraphs 4 through 6 of the Office Action. Applicants respectfully submit that all of the pending claims as presented herein patentably distinguish over the cited art and are allowable for at least the reasons set forth below.

The grinding apparatus set forth in independent claim 39 is fundamentally different from the device according to Sykes '320 alone or in combination with any other reference of record. As amended, claim 39 calls for the first set of grinding elements mounted on the support to extend outwardly from the support at essentially a right angle with respect to a longitudinal axis of the support. Claim 1 is also amended to further define the nature of the second set of grinding elements. This second set of elements is separate from the first set of elements and also extends from the support at essentially a right angle with respect to the longitudinal axis of the support. The second set of grinding elements extend a lesser distance from the support than the first set of grinding elements, and have a size and are disposed so as not to extend between the clothing elements, but to contact and grind front face sides of the clothing elements.

The configuration according to the Sykes reference is fundamentally different. The device of Sykes does not use first and second separate sets of grinding elements

that extend from a common support, but a series of solid beveled discs. Each disc is beveled or angled at its outer edge. The only structure disclosed by the Sykes reference as extending from a support and constituting a grinding element are the individual beveled discs. There is no separate set of grinding elements that are distinct and separate from the discs that also extend from the support element at a lesser distance than the disc. It cannot reasonably be asserted that the beveled discs are the same structure as the claimed first and separate set of separate grinding elements extending from the common support, wherein the second set of elements extend at a lesser distance than the first set.

The configuration according to the Sykes reference also does not satisfy the limitation of claim 1 that the first and second set of grinding elements extend at essentially right angles with respect to the longitudinal axis of the support. The very purpose of the configuration according to the Sykes reference is to orient the beveled disc at an oblique angle with respect to the shaft. It is because of this oblique angle that the discs generate a reciprocating to-and-fro motion so that each disc will grind both sides and the point of each card tooth within the range of its lateral motion. This action would not be possible unless the beveled discs are oriented at an oblique angle. In fact, the Sykes reference expressly distinguishes the construction of its discs over grinding elements that are set at a right angle with respect to the support (as in the present claim

1). At page 2 of the Sykes reference, last paragraph, the reference states:

[The discs are] distinguished from other rollers or discs in which the angles or peripheries are at right angles to the axis around which they rotate or of emery discs at fixed distances in unison with or equal to the spaces or furrows between the several lines of card teeth. (emphasis added)

Thus, the Sykes reference expressly defines the invention thereof over grinding elements that extend at essentially a right angle to the longitudinal axis of their rotational support device. The structure according to the Sykes reference does not satisfy the limitations of claim 39.

Accordingly, applicants respectfully submit that claim 39 distinguishes over the Sykes reference alone or in combination with any other reference and is allowable. Applicants further respectfully submit that the amendments to claim 39 are proper at this point in prosecution in that they only further emphasize arguments and limitations previously presented, and will require no additional search or consideration by the Examiner.

With the present Amendment, applicants respectfully submit that claim 39 is allowable, and that all remaining claims depending from 39 are also allowable. Favorable action thereon is respectfully requested. The Examiner is encouraged to contact the undersigned at his convenience should he have any questions regarding this matter or require any additional information.

Respectfully submitted,

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